

UNITED STATES BANKRUPTCY COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN

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IN RE  
Thomas Pascal  
  
Debtor.

Chapter: 13  
  
Case No. 17-29659-svk

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**STIPULATION REGARDING MOTION OF NATIONSTAR MORTGAGE LLC D/B/A MR.  
COOPER FOR RELIEF FROM THE AUTOMATIC STAY AND ABANDONMENT**

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The debtor, by the attorneys at, Kingstad Law Firm, LLC, and Nationstar Mortgage LLC d/b/a Mr. Cooper, its successors and/or assignees (hereinafter 'the movant'), by its attorneys, Gray & Associates, L.L.P., stipulate and agree that the motion shall be denied subject to the following terms and conditions:

1. The movant holds a promissory note and a mortgage encumbering the debtor's real property located at 2451-53 W McKinley Ave Milwaukee, WI 53205-2438. The debtor has failed to make monthly mortgage payments required by said note and mortgage in a timely manner. Said default in payments has caused the movant to file a motion for relief from the automatic stay herein dated January 5, 2018.

2. That the movant may file a supplemental claim for the post-petition arrearage which exists through the end of January 2018 in the amount of \$981.00. The arrearage is itemized as follows:

|                                |                   |
|--------------------------------|-------------------|
| 11/17 through 1/18             | \$1,967.34        |
| 3 mortgage payments @ \$655.78 |                   |
| Attorney Fees and Costs        | 981.00            |
| Payment received 1/23/2018     | <u>(1,967.34)</u> |
| TOTAL ARREARAGE                | <u>\$981.00</u>   |

Drafted by:

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Gray & Associates, L.L.P. is attempting to collect a debt and any information obtained will be used for that purpose. If you have previously received a discharge in a chapter 7 bankruptcy case, this communication should not be construed as an attempt to hold you personally liable for the debt.

3. That commencing in February 2018 through and including July 2018, the debtor shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, the movant, its servicing agent or its counsel may submit an affidavit of default and proposed order for immediate relief from the automatic stay to the court for signature.

4. That the Court will not enforce a “doomsday provision” (but may enforce a letter renewal to which no objection was filed) for any post-petition payment defaults prior to the effective date of this Order. The effective date of this Order is 14 days after entry.

5. That commencing in August 2018, the debtor shall make all monthly mortgage payments to the movant in sufficient time to be received on or before the 16th day of each month in which each such payment is due. In the event any such payment is not received in a timely manner, counsel for the movant may request by letter another hearing upon the motion for relief from the automatic stay.

6. That abandonment of the trustee’s interest in the property pursuant to 11 U.S.C. § 554 shall be effective when the automatic stay no longer applies to the movant and its interest in the property.

7. That the debtor shall voluntarily increase the plan payments to the trustee as necessary to pay the supplemental claim and ensure that the plan is adequately funded and remains feasible.

8. That pending further notice, the amount of the monthly mortgage payment is \$655.78 and payments shall be made to the movant at Nationstar Mortgage LLC, PO Box 619094, Dallas, TX 75261-9741.

Dated this 7<sup>th</sup> day of February, 2018

Kingstad Law Firm, LLC  
Attorneys for Debtor

By: /s/ David G. Kingstad  
David G. Kingstad

Dated this 2<sup>nd</sup> day of February, 2018

Gray & Associates, L.L.P.  
Attorneys for Movant

By: /s/ Christopher C. Drout  
Christopher C. Drout

NO OBJECTION

Dated this 5 day of February, 2018

/s/ Rebecca A Quiroz  
For Rebecca R. Garcia - Chapter 13 Trustee